

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CANDY M. SOUSA, on behalf of herself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30022 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

YOSEF STREICHER, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30026 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

[Captions continued on next page]

**PLAINTIFFS' (CORRECTED) UNOPPOSED MOTION FOR LEAVE TO
FILE REPLY BRIEFS IN SUPPORT OF RESPECTIVE MOTIONS FOR
APPOINTMENT OF LEAD PLAINTIFFS AND FOR APPROVAL
OF SELECTION OF LEAD AND LIAISON COUNSEL**

RAFAT DAWOD, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30029 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

ALVIN CHESS, individually and on behalf)
all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30037 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

MICHAEL VICKER, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30040 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

[Captions continued on next page]

H. MARTIN BOHMAN, individually and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30041 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

JIMMY SUO, on behalf of himself and all)
others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30042 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

JACK SCHULMAN, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30043 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Pursuant to Local Rule 7.1(B)(3), Plaintiffs by and through their undersigned counsel of record, respectfully move for leave of court to file reply memoranda in further support of certain pending competing Motions For Appointment of Lead Plaintiffs and For Approval of Selection of Lead and Liaison Counsel (“Lead Plaintiff Motions”).

In support of this Motion, lead plaintiff movants (i) Ron Rogers and Steve Alvarez, and (ii) Anne Brumbaugh, Gary L. Harmon and Randi K. Griffin (the “Brumbaugh Group”), contend that a reply memorandum from each of them is necessary to address the arguments and assertions in their respective moving papers and opposition memoranda. The reply memoranda for each of these lead plaintiff movants are to be filed by Wednesday, April 28, 2004. Counsel for the Gabriele Group state that they believe that further briefing on the lead plaintiff motions is unnecessary. No other lead plaintiff movants take any position as to this Motion.

In further support, Plaintiffs note that Defendants have stated that they will not oppose this Motion.

WHEREFORE, Plaintiffs Ron Rogers and Steve Alvarez, and the Brumbaugh Group, respectfully request leave of Court to file reply memorandum in support of their respective Lead Plaintiff Motions.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)

Undersigned counsel hereby certify that they conferred with counsel for Defendants in a good faith effort to resolve or narrow the issues raised by this Motion and that Defendants’ counsel has indicated that Defendants will not oppose this Motion.

Dated: April 22, 2004

Respectfully submitted,

GILMAN AND PASTOR, LLP

By: /s/ Peter A. Lagorio
Peter A. Lagorio (BBO # 567379)
GILMAN AND PASTOR, LLP
Stonehill Corporate Center
999 Broadway, Suite 500
Saugus, MA 01906
Telephone: (781) 231-7850
Facsimile: (781) 231-7840

Marc A. Topaz
Richard A. Maniskas
SCHIFFRIN & BARROWAY, LLP
Three Bala Plaza East, Suite 400
Bala Cynwyd, PA 19004
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

Counsel for Brumbaugh Group Plaintiffs

/s/ Nancy Freeman Gans
Nancy Freeman Gans (BBO #184540)
MOULTON & GANS, P.C.
33 Broad Street, Suite 1100
Boston, MA 02109
Telephone: (617) 369-7979
Facsimile: (617) 369-7980

Jeffrey W. Lawrence
Stanley S. Mallison
MILBERG WEISS BERSHAD
HYNES & LERACH LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: (415) 288-4545
Facsimile: (415) 288-4534

William S. Lerach
Darren J. Robbins
MILBERG WEISS BERSHAD
HYNES & LERACH LLP
401 B Street, Suite 1700
San Diego, CA 92101
Telephone: (619) 231-1058
Facsimile: (619) 231-7423

**Counsel for Plaintiffs Ron Rogers and
Steve Alvarez**